

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 8:23CR-142
)	
Plaintiff,)	
)	
vs.)	MOTION FOR DOWNWARD
)	DEPARTURE AND/OR VARIANCE
THOMAS O. CAMPBELL,)	
)	
Defendant.)	

COMES NOW the Defendant, Thomas Campbell, by and through undersigned counsel, and moves the Court to grant a downward variance and/or departure from the advisory guideline sentencing range based on the following:

1. The history and characteristics of the Defendant, the nature and circumstances of the offense, the need to provide restitution to any victims of the offense, and the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct, as set forth in 18 U.S.C. §3553(a);
2. The applicable guideline range overstates the gravity of the offense pursuant to USSG §§ 4C1.1 and 5C1.1 (application note 10).

WHEREFORE, Defendant prays for the relief requested.

THOMAS O. CAMPBELL, Defendant,

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, I electronically filed the foregoing Motion to Restrict with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Christopher Ferretti and Mahana Weidler, Assistant United States Attorneys

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Sean M. Conway
SEAN M. CONWAY
Attorney for Defendant